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May 1, 2024

**VIA ECF**

The Honorable Mary Kay Vyskocil U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, New York 10007

Re: **LETTER MOTION REQUESTING ADJOURNMENT OF INITIAL CASE  
MANAGEMENT TELEPHONE CONFERENCE**

*Studio-D v. The Waverly Group, et. al.*  
Case No. 1:23-cv-09001

Dear Judge Vyskocil:

Our firm represents Defendant Zoe Diamant in the above lawsuit, and we write, in accordance with the Court's April 24, 2024 Notice of Initial Pretrial Conference and Rule 2.G. of Your Honor's Individual Practices, to request an approximately two-week adjournment of the Initial Pretrial Conference currently scheduled for May 13, 2024 at 11:00 a.m., as well as the concomitant deadlines for the parties to conduct a one-hour settlement tele-conference and submit a joint letter and Proposed Civil Case Management Plan and Scheduling Order. (ECF Nos. 53 and 54). We have conferred with counsel for Plaintiff and for co-Defendants, the Waverly Group and Jane Saidenberg, all of whom consent to this request.

As noted, the conference is currently scheduled for May 13, 2024, while the parties are to conduct a one-hour settlement tele-conference and submit their Proposed Civil Case Management Plan and Order, and joint letter, by May 6, 2024. There have been no previous requests for an adjournment or extension of these deadlines. The reason for the requested adjournment and extension is that Defendant Zoe Diamant's lead counsel is on a long-planned extended family vacation, making the pre-conference deadlines difficult for him to achieve. The requested adjournment will not affect any other scheduled dates, and as noted, all parties consent to this request.

Hon. Mary Kay Vyskocil, U.S.D.J.

Re: *Studio-D v. The Waverly Group, et. al.* (1:23-cv-09001)

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We appreciate the Court's consideration of this request.

Respectfully submitted,  
KAUFMAN DOLOWICH LLP

/s/ Patrick M. Kennell


Patrick M. Kennell

Kathleen A. Mullins

Cc: All Counsel of Record (*Via ECF*)

**GRANTED. The Initial Pretrial Conference currently scheduled for May 13, 2024 is hereby ADJOURNED to June 10, 2024 at 10:30 AM. One week before the June 10 conference, the parties shall submit the joint letter and Proposed Civil Case Management Plan and Scheduling Order. SO ORDERED.**

Date: 5/2/2024  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge